

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____

v. : **DATE FILED:** _____

ARGENIS URENA : **VIOLATIONS:**

: **18 U.S.C. § 1951(a) (interference with**

: **commerce by robbery - 5 counts)**

: **18 U.S.C. § 1951(a) (interference with**

: **commerce by attempted robbery - 1**

: **count)**

: **18 U.S.C. § 924(c) (using and carrying a**

: **firearm during a crime of violence - 6**

: **counts)**

: **18 U.S.C. § 922(g)(1)(convicted felon in**

: **possession of a firearm - 1 count)**

: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Hess Express, located at 2245 Lehigh Street in Allentown, Pennsylvania, was a gas station/convenience store that sold gasoline, pharmaceuticals, cigarettes, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 14, 2007, in Allentown, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in

commerce, and attempted to do so, by robbery, in that, defendant URENA unlawfully took and obtained approximately \$90 cash from employees of the Hess Express and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employees, that is, by pointing a firearm at the employees, demanding money, and threatening the employees.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2007, in Allentown, in the Eastern District of
Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
interference with commerce by robbery, in violation of Title 18, United States Code, Section
1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. The Sunoco/A-Plus, located at 2138 Hamilton Street in Allentown, Pennsylvania, was a gas station/convenience store that sold gasoline, fast food, cigarettes, cigars, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 14, 2007, in Allentown, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant URENA unlawfully took and obtained at least \$100 cash from an employee of the Sunoco/A-Plus 7-Eleven and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2007, in Allentown, in the Eastern District of
Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
interference with commerce by robbery, in violation of Title 18, United States Code, Section
1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

At all times material to this indictment:

1. The Sunoco/A-Plus, located at 3100 Tilghman Street in Allentown, Pennsylvania, was a gas station/convenience store that sold gasoline, fast food, cigarettes, cigars, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 16, 2007, in Allentown, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant URENA unlawfully took and obtained approximately less than \$100 cash from an employee of the Sunoco/A-Plus Mini-Market and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 16, 2007, in Allentown, in the Eastern District of
Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
interference with commerce by robbery, in violation of Title 18, United States Code, Section
1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

At all times relevant to this indictment:

1. The Turkey Hill Mini-Market, located at 2901 West Emmaus Avenue in Allentown, Pennsylvania, was a gas station/convenience store that sold gasoline, fast food, cigarettes, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 19, 2007, in Allentown, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant URENA unlawfully took and obtained approximately \$183 cash from an employee of the Turkey Hill Mini-Market and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

On or about March 19, 2007, in Allentown, in the Eastern District of
Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
interference with commerce by robbery, in violation of Title 18, United States Code, Section
1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

At all times relevant to this indictment:

1. The 7-Eleven, located at 1426 West Broad Street in Bethlehem, Pennsylvania, was a gas station/convenience store that sold gasoline, fast food, cigarettes, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 20, 2007, in Bethlehem, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant URENA unlawfully took and obtained approximately \$121 cash from an employee of the 7-Eleven and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

On or about March 20, 2007, in Bethlehem, in the Eastern District of
Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of
violence for which the defendant may be prosecuted in a court of the United States, that is,
interference with commerce by robbery, in violation of Title 18, United States Code, Section
1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

1. The Turkey Hill Mini-Market, located at 106 South Third Street in Coopersburg, Pennsylvania, was a gas station/convenience store that sold gasoline, cigarettes, cigars, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 23, 2007, in Coopersburg, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant URENA unlawfully attempted to take and obtain money and other property from an employee of the Turkey Hill Mini-Market and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, pointing a firearm at a customer, demanding money, and threatening the employee and customer.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2007, in Coopersburg, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA

knowingly used and carried a firearm, that is, a Sturm Ruger .22 caliber, Mark II, semi-automatic handgun, serial no. 19-49941, loaded with one live hollow-point round of ammunition in the chamber and one live hollow-point round of ammunition in the magazine, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, interference with commerce by attempted robbery, in violation of Title 18, United States Code, Section 1951(a).

In violation of Title 18, United States Code, Section 924(c).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2007, in Coopersburg, in the Eastern District of Pennsylvania, defendant

ARGENIS URENA,

having been convicted in a court of the State of New York of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Sturm Ruger .22 caliber, Mark II, semi-automatic handgun, serial no. 19-49941, loaded with two live hollow-point rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendant

ARGENIS URENA

shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to:

- 1) One Sturm Ruger .22 caliber, Mark II, semi-automatic handgun, serial no. 19-49941; and
- 2) two rounds of .22 caliber ammunition.

Pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

TRUE BILL:

GRAND JURY FOREPERSON

LAURIE MAGID
ACTING UNITED STATES ATTORNEY